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19 Attorneys for Defendants

20 Louisa Ayrapetyan; Natalie Leonard; Leah Wilson; Brandon Stallings; Ruben Duran;  
21 Hailyn Chen; Audrey Ching; Melanie Shelby; Arnold Sowell, Jr.; Mark Toney; Paul  
22 Kramer; Jean Krasilnikoff; Ellin Davtyan; George Cardona; Devan McFarland; Enrique  
23 Zuniga

24 UNITED STATES DISTRICT COURT  
25 CENTRAL DISTRICT OF CALIFORNIA

26 TODD R.G. HILL,

27 Plaintiff,

28 Case No.: 2:23-cv-01298-CV (BFM)

v.

29 THE BOARD OF DIRECTORS,  
30 OFFICERS AND AGENTS AND  
31 INDIVIDUALS OF THE PEOPLES  
32 COLLEGE OF LAW, et al.,

33 Defendants.

34 **STATE BAR DEFENDANTS' CASE  
35 MANAGEMENT STATEMENT**

36 MAGISTRATE Hon. Brianna Fuller  
37 JUDGE: Mircheff

38 DISTRICT Hon. Cynthia  
39 JUDGE: Valenzuela

1 Defendants Louisa Ayrapetyan, Natalie Leonard, Leah Wilson, Brandon Stallings,  
2 Ruben Duran, Hailyn Chen, Audrey Ching, Melanie Shelby, Arnold Sowell, Jr., Mark  
3 Toney, Paul Kramer, Jean Krasilnikoff, Ellin Davtyan, George Cardona, Devan  
4 McFarland, and Enrique Zuniga (collectively, “State Bar Defendants”) submit the  
5 following Case Management Statement per this Court’s Reassignment Order.<sup>1</sup> *See* Dkt.  
6 205.

7 **A. THE DATE THE CASE WAS FILED**

8 Plaintiff filed his initial Complaint on February 20, 2023. *See* Dkt. 1. On April 5,  
9 2023, the Court sua sponte dismissed the Complaint with leave to amend after finding  
10 that it violated Federal Rule of Civil Procedure 8. *See* Dkt. 37. On April 18, 2023,  
11 Plaintiff filed a First Amended Complaint (“FAC”). *See* Dkt. 38. On June 7, 2023, the  
12 Court again sua sponte dismissed the FAC for violating Rule 8. *See* Dkt. 45. On  
13 September 20, 2023, Plaintiff filed a Second Amended Complaint (“SAC”). *See* Dkt. 55.  
14 On August 5, 2024, the Court dismissed the SAC with leave to amend, but also dismissed  
15 certain claims with prejudice. *See* Dkt. 145.

16 On August 21, 2024, Plaintiff filed the operative Third Amended Complaint  
17 (“TAC”). *See* Dkt. 148. On September 6, 2024, Plaintiff filed a Motion to Amend the  
18 TAC. *See* Dkts. 163, 164. On September 23, 2024, the State Bar Defendants filed a  
19 Motion to Dismiss Plaintiff’s TAC. *See* Dkt. 172. On February 6, 2025, the action was  
20 reassigned to this Court. *See* Dkt. 205. On February 12, 2025, the Magistrate Judge  
21 issued an Interim Report and Recommendation recommending that the State Bar  
22 Defendants’ Motion be granted, the State Bar Defendants be dismissed from the case  
23 with prejudice, Plaintiff’s Motion to Amend the TAC be denied, and Plaintiff be  
24 permitted to file a Fourth Amended Complaint asserting certain limited claims only  
25 against defendants associated with the Peoples College of Law. *See* Dkt. 213. Any

26  
27 <sup>1</sup> The State Bar Defendants are submitting a separate Case Management Statement  
28 because Plaintiff is proceeding pro se. *See* Dkt. 205 at 3 (permitting separate statements if  
“any party is proceeding without counsel”).

1 objections to the Magistrate Judge's Interim Report and Recommendation are due by  
2 February 26, 2025. *See* Dkt. 214.

3 **B. A LIST IDENTIFYING OR DESCRIBING EACH PARTY**

4 Plaintiff has named various individuals and entities associated with the Peoples  
5 College of Law and the State Bar of California ("State Bar") as defendants in the TAC.

6 **Defendants Associated with the State Bar:**

7 Louisa Ayrapetyan, Natalie Leonard, Leah Wilson, Brandon Stallings, Ruben  
8 Duran, Hailyn Chen, Audrey Ching, Melanie Shelby, Arnold Sowell, Jr., Mark Toney,  
9 Paul Kramer, Jean Krasilnikoff, Ellin Davtyan, George Cardona, Devan McFarland, and  
10 Enrique Zuniga.

11 Defendants associated with the Peoples College of Law will be listed in their  
12 respective Case Management Statements. The State Bar Defendants understand these  
13 defendants' affiliation is as follows:

14 **Defendants Associated with the Peoples College of Law:**

15 The Guild Law School d/b/a Peoples College of Law, Joshua Gillens, William  
16 Maestas, Board of Directors for The Peoples College of Law, Christina Marin Gonzalez,  
17 Roger Aramayo, Ismail Venegas, Clemente Franco, Hector Pena, Pascual Torres, Carol  
18 Deupree, Jessica Viramontes, Juan Sarinana, Adriana Zuniga, Prem Sarin, David  
19 Bouffard, Hector Sanchez, Robert Spiro, Gary Silbiger, and Edith Pomposo.<sup>2</sup>

20 **C. A BRIEF SUMMARY OF ALL CLAIMS, COUNTERCLAIMS,  
21 CROSSCLAIMS, OR THIRD-PARTY CLAIMS**

22 Plaintiff asserts eight causes of action in the TAC purportedly arising out of  
23 administrative failures at the Peoples College of Law and the State Bar's alleged failure  
24 to adequately regulate the school. *See generally* Dkt. 148 (TAC). These causes of action  
25 are: (1) a Fourteenth Amendment Equal Protection claim; (2) violation of the Unruh Civil  
26

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27 <sup>2</sup> Although Defendants Gary Silbiger and Edith Pomposo are named as defendants in the  
28 TAC, the docket does not reflect that these defendants were ever served or that they have  
appeared in this action. *See generally* Dkt.

1 Rights Act; (3) violation of Title VI of the Civil Rights Act of 1964; (4) violation of the  
2 Racketeer Influenced and Corrupt Organizations Act; (5) conspiracy; (6) negligence and  
3 negligence per se; (7) negligent hiring; and (8) violation of Title IX of the Education  
4 Amendments of 1972. *Id.* Each of these claims is asserted against the State Bar  
5 Defendants. *Id.*

6 **D. A BRIEF DESCRIPTION OF THE EVENTS UNDERLYING THE ACTION**

7 As with Plaintiff's prior pleadings, which this Court has previously described as  
8 "prolix, rambling, and excessively long," Plaintiff's 54-page TAC contains 276  
9 paragraphs of allegations along with 128 pages of exhibits and is difficult to understand.  
10 In summary, Plaintiff alleges that he is a former student at the Peoples College of Law, an  
11 unaccredited private law school in Los Angeles, California. TAC ¶¶ 40–50. Plaintiff  
12 alleges the Peoples College of Law's practices did not comply with the State Bar's  
13 standards and that the State Bar ultimately revoked the school's registration and  
14 terminated its degree-granting authority in May 2024. *Id.* ¶¶ 110–14. Plaintiff claims the  
15 Peoples College of Law committed various civil rights violations and that the State Bar  
16 Defendants failed to adequately regulate the school. *See generally* TAC.

17 **E. A DESCRIPTION OF THE RELIEF SOUGHT AND THE DAMAGES  
18 CLAIMED WITH AN EXPLANATION OF HOW DAMAGES HAVE BEEN  
19 (OR WILL BE) COMPUTED**

20 Plaintiff seeks numerous types of relief: (1) monetary relief, including an  
21 unspecified amount of compensatory damages, \$750,000 in treble damages, and an  
22 unspecified amount of punitive damages; (2) declaratory relief that the State Bar has an  
23 unlawful policy, failed to adequately supervise the Peoples College of Law, and that the  
24 school's practices violate the Unruh Act and California Business & Professions Code; (3)  
25 injunctive relief ordering all defendants to acknowledge their wrongdoing, issue a public  
26 apology to Plaintiff, establish a restitution fund, implement reforms and transparency  
27 measures, implement Title IV and Title IX policies and trainings, provide Plaintiff with  
28 his transcripts and award him a degree, and investigate various State Bar employees; (4)  
permanent injunctions against the State Bar and Peoples College of Law; (5) civil

1 penalties under the Business and Professions Code; (6) the “permanent removal” of all  
2 defendants; (7) a declaration of Plaintiff’s “good faith indemnification;” (8) Plaintiff’s  
3 costs of suit; (8) a determination regarding the validity of a board election at the Peoples  
4 College of Law; and (9) any other relief that the Court deems just and equitable. *See* TAC  
5 ¶¶ 260–76.

6 The State Bar Defendants are unaware of how Plaintiff has calculated or will  
7 calculate his requested damages.

8 **F. THE STATUS OF DISCOVERY, INCLUDING ANY SIGNIFICANT  
9 DISCOVERY MANAGEMENT ISSUES, AS WELL THE APPLICABLE  
CUTOFF DATES**

10 No discovery has been conducted in this case. The State Bar Defendants  
11 understand the Court’s Reassignment Order as requiring the parties to submit Case  
12 Management Statements rather than conduct a conference under Federal Rule of Civil  
13 Procedure 26(f). Due to the jurisdictional issues presented in this case (*see* Dkt. 172), the  
14 State Bar Defendants request that any discovery in this case be stayed until the pleadings  
15 are resolved. Additionally, the State Bar Defendants note that the Magistrate Judge has  
16 recommended that the State Bar Defendants’ Motion to Dismiss Plaintiff’s TAC be  
17 granted and the State Bar Defendants be dismissed with prejudice from this action. *See*  
18 Dkt. 213.

19 **G. A PROCEDURAL HISTORY OF THE CASE, INCLUDING ANY  
20 PREVIOUS MOTIONS THAT WERE DECIDED OR SUBMITTED, ANY  
ADR PROCEEDINGS OR SETTLEMENT CONFERENCES THAT HAVE  
21 BEEN SCHEDULED OR CONCLUDED, AND ANY APPELLATE  
22 PROCEEDINGS THAT ARE PENDING OR CONCLUDED**

23 The procedural history of this case is summarized under section A (“The Date the  
24 Case Was Filed.”) There have been no settlement conferences or appellate proceedings in  
25 this case.

26 **H. A DESCRIPTION OF ANY OTHER DEADLINES IN PLACE BEFORE  
27 REASSIGNMENT**

28 There were no deadlines in place before reassignment.

1 **I. WHETHER THE PARTIES WILL CONSENT TO A MAGISTRATE  
2 JUDGE FOR TRIAL**

3 The State Bar Defendants do not consent to a Magistrate Judge for trial.

4 Additionally, as explained in the State Bar Defendants' Motion to Dismiss Plaintiff's  
5 TAC, which the Magistrate Judge has recommended granting, no trial should proceed as  
6 to the State Bar Defendants due to jurisdictional and immunity issues. *See* Dkts. 172, 213.

7 **J. A STATEMENT FROM EACH PARTIES' COUNSEL INDICATING THEY  
8 HAVE (1) DISCUSSED THE MAGISTRATE JUDGE CONSENT  
9 PROGRAM WITH THEIR RESPECTIVE CLIENT(S), AND (2) MET AND  
10 CONFERRED TO DISCUSS THE CONSENT PROGRAM AND  
11 SELECTION OF A MAGISTRATE JUDGE**

12 The State Bar Defendants do not consent to the Magistrate Judge resolving  
13 dispositive matters in this case. Accordingly, the State Bar Defendants have not met and  
14 conferred with the other parties in this case regarding the consent program or the  
15 selection of a Magistrate Judge.

16 **K. WHETHER THERE IS AN IMMEDIATE NEED FOR A SCHEDULING  
17 CONFERENCE AND, IF SO, WHY THE PARTIES BELIEVE SUCH A  
18 NEED EXISTS.**

19 There is no immediate need for a scheduling conference.

20 Dated: February 20, 2025

21 Respectfully submitted,

22 By: /s/ JENNIFER KO  
23 JENNIFER KO  
24 Assistant General Counsel

25 Attorneys for Defendants  
26 Louisa Ayrapetyan; Natalie Leonard;  
27 Leah Wilson; Brandon Stallings; Ruben  
28 Duran; Hailyn Chen; Audrey Ching;  
Melanie Shelby; Arnold Sowell, Jr.;  
Mark Toney; Paul Kramer; Jean  
Krasilnikoff; Ellin Davtyan; George  
Cardona; Devan McFarland; Enrique  
Zuniga

## DECLARATION OF SERVICE

I, Ryan Sullivan, hereby declare: that I am over the age of eighteen years and am not a party to the within above-entitled action, that I am employed in the City and County of San Francisco, that my business address is The State Bar of California, 180 Howard Street, San Francisco, CA 94105. On February 20, 2025, following ordinary business practice, I filed via the United States District Court, Central District of California electronic case filing system, the following:

## STATE BAR DEFENDANTS' CASE MANAGEMENT STATEMENT

Participants in the case who are registered CM/ECF users will be served.

*See the CM/ECF service list.*

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed at San Francisco, California, on February 20, 2025.

Ryan Sullivan

Ryan Sullivan